

SO ORDERED.



Dale E. Ho  
United States District Judge  
Dated: December 18, 2024  
New York, New York

**VIA ECF**

The Hon. Dale E. Ho, U.S.D.J.  
U.S. District Court, Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Mbaye et al v. RCI Hospitality Holdings, Inc. et al*  
**Case No.: 23-cv-02967**

Dear Honorable Judge Ho:

This law firm is counsel to the Plaintiffs in the above-referenced action.

Pursuant to Your Honor's Individual Motion Practice Rules 2(e), the instant letter motion respectfully serves to request an extension of: (i) Plaintiffs' deadline to file their opposition to Defendants' motion for summary judgment [Dckt. Nos. 118-122] (the "Motion for Summary Judgment") from December 20, 2024 to, through and including January 10, 2025; and (ii) Defendants' deadline to file their reply in support of the Motion for Summary Judgment from January 13, 2025 to, through and including, February 3, 2025.

This is the third<sup>1</sup> request of its kind, and is made on consent of Defendants. If granted, the instant request would not affect any other scheduled deadlines.

The basis of the instant request is that the undersigned law firm has limited availability over the next two (2) weeks due to conflicting international travel obligations, and prior-scheduled professional commitments. In light of the foregoing, a short extension of the existing briefing schedule is needed, in order for the undersigned law firm to review the eight (8) deposition transcripts in the instant action, the parties' voluminous paper discovery productions, and meaningfully respond to the Motion for Summary Judgment.

We thank the Court for its attention to this matter, and are available at the Court's convenience to answer any questions related to the foregoing.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel

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<sup>1</sup> The initial two (2) requests, were made by counsel for Defendants, on consent of Plaintiffs. [See Dckt. Nos. 113, 123]. Thus, this is Plaintiffs' first request for an extension.